

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006
OF CENTENNIAL PUERTO RICO OPERATIONS CORP.
D/B/A CENTENNIAL DE PUERTO RICO**

EB-06-TC-060 / WC DOCKET NO. 06-36

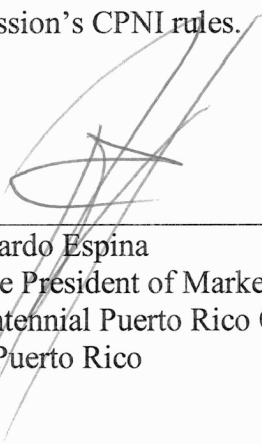
Pursuant to the recent Public Notice¹ issued by the Enforcement Bureau asking all telecommunications carriers to file with the Commission by February 6, 2006 the customer proprietary network information (“CPNI”) compliance certificates required under section 64.2009(e) of the Commission’s rules, Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico hereby submits the following certificate and statement.²

I, Ricardo Espina, Vice President Vice President of Marketing and Sales, Centennial Puerto Rico Operations Corp. d/b/a Centennial de Puerto Rico, hereby certify that I have personal knowledge that Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico has established operating procedures that are adequate to ensure compliance with the Commission’s CPNI rules, found at 47 C.F.R. Pt. 64, Subpt. U. Attached to this certificate is a statement explaining how the operating procedures of Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico ensure that it

¹ Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications, Public Notice, DA 06-223 (EB rel. Jan. 30, 2006); *see also* Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications (EB Docket No. 06-36), Public Notice, DA 06-258 (EB rel. Feb. 2, 2006).

² Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico provides commercial mobile radio services in Puerto Rico. Centennial Puerto Rico Operations Corp. also provides broadband services in Puerto Rico, but under a different “doing business as” name: “Centennial Business Solutions.” Centennial Puerto Rico Operations Corp. d/b/a/ Centennial Business Solutions is filing, concurrently with this certification, a CPNI certification for its broadband business.

is in compliance with the Commission's CPNI rules.

A handwritten signature in dark ink, appearing to be 'Ricardo Espina', is written over a horizontal line. The signature is stylized with a large, sweeping 'R' and a distinct 'E'.

Ricardo Espina
Vice President of Marketing and Sales
Centennial Puerto Rico Operations Corp. d/b/a Centennial
de Puerto Rico

**STATEMENT CONCERNING PROCEDURES ENSURING
COMPLIANCE WITH CPNI REGULATIONS**

The operating procedures and practices of Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico (“Centennial PR”) ensure that Centennial PR complies with the Commission’s rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use of customer proprietary network information (“CPNI”). Compliance with such rules is demonstrated by the policies and practices employed by Centennial PR, a brief explanation of which is provided below.

First, Centennial PR only provides one category of services to its customers—commercial mobile radio service or “CMRS.” Therefore, Centennial PR only uses CPNI to market various CMRS calling plans or CMRS features to customers who already purchase CMRS services from Centennial PR, which does not require customer approval under the Commission’s rules. (Should Centennial PR expand its business to include other categories of service, it will implement a system to clearly establish the status of a customer’s CPNI approval prior to any use of, disclosure of or permitting access to its customers’ CPNI.³)

Second, Centennial PR does not disclose CPNI to, or permit access to CPNI, by third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter), as is necessary for the provision of the CMRS service itself, or in connection with the use of contract workers. In any case, any third parties to which CPNI is disclosed or who are

³ As explained in footnote two of the attached certification, Centennial Puerto Rico Operations Corp. d/b/a/ Centennial de Puerto Rico provides CMRS services, and Centennial Puerto Rico Operations Corp. d/b/a Centennial Business Solutions (“Centennial Business Solutions”) provides broadband services. Centennial PR does not disclose CMRS customers’ CPNI, or provide access to such information, to Centennial Business Solutions.

given access to CPNI are only given access to appropriate CPNI for the third party's purpose, and only after executing a confidentiality agreement or pursuant to the terms of a valid subpoena, court order, etc.

Third, Centennial PR employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

1. Centennial PR provides all employees with a copy of its corporate privacy policy, which is contained in a document entitled "Code of Conduct." The Code of Conduct instructs employees to not disclose any customer account information to anyone, except as authorized by law and to seek advice from the legal department if the employee has a question regarding the validity of a subpoena, court order, etc. to disclose customer information. Moreover, sales and customer service employees receive additional instruction on the proper handling of confidential customer information.

2. Centennial PR has a disciplinary program to ensure compliance with its operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.

3. Centennial PR maintains records of marketing campaigns that use Centennial PR customer CPNI, as well as those occasions where CPNI is released to third parties (such a release occurring pursuant to a valid subpoena). Marketing activities are supervised by the Vice President of Marketing and Sales. Records of marketing campaigns and any CPNI releases to third parties are retained for at least one year.